

Exhibit 2

Babchinetskaya, Izabella (Phila)

From: Powell, Courtney <cpowell@spencerfane.com>
Sent: Wednesday, December 21, 2022 1:03 AM
To: Babchinetskaya, Izabella (Phila)
Cc: Leckerman, Jason (Phila); Swaminathan, Lisa B. (Phila); Jonathan Irwin; Tianna Mays; Woody Glass; aago@lawyerscommittee.org; Hatza, Nikki (Phila)
Subject: RE: Hill et al. v. Town of Valley Brook
Attachments: Haynes Responses to Plaintiffs' First Interrogatories.pdf; Nieman Responses to Plaintiffs' First Interrogatories.pdf; Stamp Responses to Plaintiffs' First Interrogatories.pdf; Valley Brook's Responses to Plaintiffs' First Interrogatories_FINAL.pdf

EXTERNAL

Please see the attached. Courtney

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From: Powell, Courtney
Sent: Monday, December 19, 2022 9:46 AM
To: 'Babchinetskaya, Izabella' <Babchinetskayal@ballardspahr.com>
Cc: 'Leckerman, Jason' <LeckermanJ@ballardspahr.com>; 'Swaminathan, Lisa B.' <SwaminathanL@ballardspahr.com>; 'Jonathan Irwin' <Jonathan@wardglasslaw.com>; 'Tianna Mays' <tmays@lawyerscommittee.org>; 'Woody Glass' <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>; 'aago@lawyerscommittee.org' <aago@lawyerscommittee.org>; 'Hatza, Nikki' <hatzan@ballardspahr.com>; 'Yip, Simon' <YipY@ballardspahr.com>; Holcum, Laura <lholcum@spencerfane.com>
Subject: RE: Hill et al. v. Town of Valley Brook

Please see the link below for production:

<https://spencerfane.sharefile.com/d-s9474418978584c049f6220d216ec5850>

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From: Powell, Courtney
Sent: Thursday, December 15, 2022 4:57 PM
To: 'Babchinetskaya, Izabella' <Babchinetskayal@ballardspahr.com>

Cc: 'Leckerman, Jason' <LeckermanJ@ballardspahr.com>; 'Swaminathan, Lisa B.' <SwaminathanL@ballardspahr.com>; 'Jonathan Irwin' <Jonathan@wardglasslaw.com>; 'Tianna Mays' <tmays@lawyerscommittee.org>; 'Woody Glass' <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>; 'aago@lawyerscommittee.org' <aago@lawyerscommittee.org>; 'Hatza, Nikki' <hatzan@ballardspahr.com>; 'Yip, Simon' <YipY@ballardspahr.com>; Holcum, Laura <lholkum@spencerfane.com>

Subject: RE: Hill et al. v. Town of Valley Brook - Depositions

Izabella –

Below is a link with production:

<https://spencerfane.sharefile.com/d-sd8c057b57338422585143142a1c29bd0>

Thanks, Courtney

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From: Powell, Courtney

Sent: Thursday, December 15, 2022 4:33 PM

To: Babchinetskaya, Izabella <BabchinetskayaI@ballardspahr.com>

Cc: Leckerman, Jason <LeckermanJ@ballardspahr.com>; Swaminathan, Lisa B. <SwaminathanL@ballardspahr.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>; aago@lawyerscommittee.org; Hatza, Nikki <hatzan@ballardspahr.com>; Yip, Simon <YipY@ballardspahr.com>; Holcum, Laura <lholkum@spencerfane.com>

Subject: RE: Hill et al. v. Town of Valley Brook - Depositions

Izabella –

We have received your e-mails concerning the missing ticket jackets, depositions and responses to discovery. We will address each in turn, but if we have omitted anything, please let us know so we can address.

(1) The following link should be the Ticket Jackets you are missing: <https://spencerfane.sharefile.com/d-s3ef99b132919445a92009526bb34dc6e>.

(2) In addition, below are two additional links containing production:

<https://spencerfane.sharefile.com/d-s54cfcc46c2d44899873f21ad46153fed>

<https://spencerfane.sharefile.com/d-s91c473c4b1bf4bcaa5948269d20fe00f>

(3) We are reviewing availability for January 5 – 12. Tentatively, we are looking at 10 & 11, and I will confirm those with you. We will accept service.

(4) With regard to the discovery responses, we are still waiting to finalize with certain individuals. We appreciate your patience, as it has taken longer due to illness among the individuals with whom we need to meet with. We will have all responses to you by Tuesday, December 20.

Thank you,
Courtney

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From: Babchinetskaya, Izabella <BabchinetskayaI@ballardspahr.com>
Sent: Thursday, December 15, 2022 9:48 AM
To: Powell, Courtney <cpowell@spencerfane.com>
Cc: Leckerman, Jason <LeckermanJ@ballardspahr.com>; Swaminathan, Lisa B. <SwaminathanL@ballardspahr.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>; aago@lawyerscommittee.org; Hatza, Nikki <hatzan@ballardspahr.com>; Yip, Simon <YipY@ballardspahr.com>; Holcum, Laura <lholkum@spencerfane.com>
Subject: [EXTERNAL] RE: Hill et al. v. Town of Valley Brook - Depositions

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Courtney,

Defendants' answers to interrogatories were due on December 7, 2022. We have not received any answers. Please let us know if you are available for a meet and confer tomorrow.

Thank you,
Izabella

From: Powell, Courtney <cpowell@spencerfane.com>
Sent: Friday, December 9, 2022 5:04 PM
To: Babchinetskaya, Izabella (Phila) <BabchinetskayaI@ballardspahr.com>
Cc: Leckerman, Jason (Phila) <LeckermanJ@ballardspahr.com>; Swaminathan, Lisa B. (Phila) <SwaminathanL@ballardspahr.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>; aago@lawyerscommittee.org; Hatza, Nikki (Phila) <hatzan@ballardspahr.com>; Yip, Simon (Phila) <YipY@ballardspahr.com>; Holcum, Laura <lholkum@spencerfane.com>
Subject: RE: Hill et al. v. Town of Valley Brook - Depositions

 **EXTERNAL**

Due to illnesses, I am unable to finalize responses and obtain verifications. We will have answers to you on Wednesday of next week.

Courtney

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From: Babchinetskaya, Izabella <BabchinetskayaI@ballardspahr.com>
Sent: Friday, December 9, 2022 7:50 AM
To: Powell, Courtney <cpowell@spencerfane.com>
Cc: Leckerman, Jason <LeckermanJ@ballardspahr.com>; Swaminathan, Lisa B. <SwaminathanL@ballardspahr.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>; aago@lawyerscommittee.org; Hatza, Nikki <hatzan@ballardspahr.com>; Yip, Simon <YipY@ballardspahr.com>; Holcum, Laura <lholkum@spencerfane.com>
Subject: [EXTERNAL] RE: Hill et al. v. Town of Valley Brook - Depositions

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Courtney,

We're working on confirming the 21st and 22nd. In addition, defendants' answers to interrogatories were due on December 7, 2022. Please advise when we'll have the answers.

Thanks,
Izabella

From: Powell, Courtney <cpowell@spencerfane.com>
Sent: Thursday, December 8, 2022 12:44 PM
To: Babchinetskaya, Izabella (Phila) <BabchinetskayaI@ballardspahr.com>
Cc: Leckerman, Jason (Phila) <LeckermanJ@ballardspahr.com>; Swaminathan, Lisa B. (Phila) <SwaminathanL@ballardspahr.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>; aago@lawyerscommittee.org; Hatza, Nikki (Phila) <hatzan@ballardspahr.com>; Yip, Simon (Phila) <YipY@ballardspahr.com>; Holcum, Laura <lholkum@spencerfane.com>
Subject: RE: Hill et al. v. Town of Valley Brook - Depositions

 **EXTERNAL**
Izabella –

The link is below.

I am having a difficult time finding two consecutive dates. I think 12-21 and 12-22 will work. I am working to rearrange my schedule to make the 21st work. I will know by end of the day if I can move my schedule around. If I can, would those dates work for you?

<https://spencerfane.sharefile.com/d-s41100df49c79471fa9e4f3f7b60175fe>

Courtney

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From: Powell, Courtney
Sent: Wednesday, December 7, 2022 9:10 AM
To: 'Babchinetskaya, Izabella' <BabchinetskayaI@ballardspahr.com>
Cc: 'Leckerman, Jason' <LeckermanJ@ballardspahr.com>; 'Swaminathan, Lisa B.' <SwaminathanL@ballardspahr.com>; 'Jonathan Irwin' <Jonathan@wardglasslaw.com>; 'Tianna Mays' <tmays@lawyerscommittee.org>; 'Woody Glass' <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>; 'aago@lawyerscommittee.org' <aago@lawyerscommittee.org>; 'Hatza, Nikki' <hatzan@ballardspahr.com>; 'Yip, Simon' <YipY@ballardspahr.com>; Holcum, Laura <lholkum@spencerfane.com>
Subject: RE: Hill et al. v. Town of Valley Brook - Depositions

Izabella –

Please see the below link. With regard to the depositions, my daughter is sick and I was home with her yesterday, pushing my call off. It was rescheduled to today – I will have dates this afternoon.

Thanks, Courtney

<https://spencerfane.sharefile.com/d-s96083037600a43c38475a1bb66c13616>

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From: Powell, Courtney
Sent: Monday, December 5, 2022 7:32 PM
To: 'Babchinetskaya, Izabella' <BabchinetskayaI@ballardspahr.com>
Cc: 'Leckerman, Jason' <LeckermanJ@ballardspahr.com>; 'Swaminathan, Lisa B.' <SwaminathanL@ballardspahr.com>; 'Jonathan Irwin' <Jonathan@wardglasslaw.com>; 'Tianna Mays' <tmays@lawyerscommittee.org>; 'Woody Glass' <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>; 'aago@lawyerscommittee.org' <aago@lawyerscommittee.org>; 'Hatza, Nikki' <hatzan@ballardspahr.com>; 'Yip, Simon' <YipY@ballardspahr.com>
Subject: RE: Hill et al. v. Town of Valley Brook - Depositions

Please see the below link for today's production.

<https://spencerfane.sharefile.com/d-s99d3b4c5f4ec4724b7752ce7e8c0eab6>

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From: Powell, Courtney
Sent: Monday, December 5, 2022 10:35 AM
To: 'Babchinetskaya, Izabella' <BabchinetskayaI@ballardspahr.com>
Cc: Leckerman, Jason <LeckermanJ@ballardspahr.com>; Swaminathan, Lisa B. <SwaminathanL@ballardspahr.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>; aago@lawyerscommittee.org; Hatza, Nikki <hatzan@ballardspahr.com>; Yip, Simon <YipY@ballardspahr.com>
Subject: RE: Hill et al. v. Town of Valley Brook - Depositions

Izabella – We will have dates to you tomorrow morning. Also, below is the link to additional production. Thanks, Courtney

<https://spencerfane.sharefile.com/d-sde23516991cf48fdbd71585026b0959e>

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From: Babchinetskaya, Izabella <BabchinetskayaI@ballardspahr.com>
Sent: Monday, December 5, 2022 10:32 AM
To: Powell, Courtney <cpowell@spencerfane.com>
Cc: Leckerman, Jason <LeckermanJ@ballardspahr.com>; Swaminathan, Lisa B. <SwaminathanL@ballardspahr.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>; aago@lawyerscommittee.org; Hatza, Nikki <hatzan@ballardspahr.com>
Subject: [EXTERNAL] RE: Hill et al. v. Town of Valley Brook - Depositions

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Courtney,

I'm following up on scheduling depositions for Jeremy Mashore, Justin Nelson, and Ray Vincent. Please let us know if you were able to confirm employment status and availability.

Thanks,
Izabella

From: Babchinetskaya, Izabella (Phila)
Sent: Monday, November 28, 2022 6:16 PM
To: 'Powell, Courtney' <cpowell@spencerfane.com>
Cc: Leckerman, Jason (Phila) <LeckermanJ@ballardspahr.com>; Swaminathan, Lisa B. (Phila) <SwaminathanL@ballardspahr.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>; aago@lawyerscommittee.org; Hatza, Nikki (Phila) <hatzan@ballardspahr.com>
Subject: RE: Hill et al. v. Town of Valley Brook - Depositions

Yes, that's right. Thank you.

From: Powell, Courtney <cpowell@spencerfane.com>
Sent: Monday, November 28, 2022 6:10 PM
To: Babchinetskaya, Izabella (Phila) <Babchinetskayal@ballardspahr.com>
Cc: Leckerman, Jason (Phila) <LeckermanJ@ballardspahr.com>; Swaminathan, Lisa B. (Phila) <SwaminathanL@ballardspahr.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>; aago@lawyerscommittee.org; Hatza, Nikki (Phila) <hatzan@ballardspahr.com>
Subject: RE: Hill et al. v. Town of Valley Brook - Depositions

⚠ EXTERNAL

I will confirm their employment status and dates of availability. To be clear, your plan is to depose the three individuals in two consecutive days?

I look forward to receiving the draft. Thanks, Courtney

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From: Babchinetskaya, Izabella <Babchinetskayal@ballardspahr.com>
Sent: Monday, November 28, 2022 5:04 PM
To: Powell, Courtney <cpowell@spencerfane.com>
Cc: Leckerman, Jason <LeckermanJ@ballardspahr.com>; Swaminathan, Lisa B. <SwaminathanL@ballardspahr.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>; aago@lawyerscommittee.org; Hatza, Nikki <hatzan@ballardspahr.com>
Subject: [EXTERNAL] Hill et al. v. Town of Valley Brook - Depositions

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Courtney,

We're planning on noticing the depositions of Jeremy Mashore, Justin Nelson, and Ray Vincent. Please let us know if there are two consecutive days between December 5 and December 20 that would work for you and the deponents. To the extent that Mr. Mashore and Mr. Nelson are no longer employed by Valley Brook, please let us know if you plan to represent them and whether you will accept service on their behalf.

Also, the deadline for the joint status report is tomorrow. We will circulate a draft by tomorrow afternoon.

Thank you,
Izabella

Izabella Babchinetskaya
2022 Pro Bono Honor Roll – Gold

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